

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION**

UNITED STATES OF AMERICA) **No. 20-CR-00006**
Plaintiff,)
v.) **Honorable Judge**
ROMEL MURPHY,) **C.J. Williams , Presiding**
Defendant)

UNOPPOSED MOTION TO EXTEND DEADLINES FOR PLEA ENTRY AND TRIAL

NOW COMES THE DEFENDANT, Romel Murphy, by and through his attorney, Jeffrey B. Steinback, and respectfully asks this Honorable Court to extend the deadlines for the entry of his plea agreement and the corresponding trial date for 60 days, or to a date later, consistent with the calendar requirements of the Court. In support, the following is offered:

1. On February 6, 2020 Mr. Murphy was charged with wire fraud and identity theft and arraigned in this Honorable Court. The date currently set for notification of a plea is 12/14/2020.
2. Mr. Murphy, and his attorney, the undersigned, have been in contact with AUSA Kyndra Lundquist and confirmed their intention to resolve this case by way of a plea agreement, obviating any need for a trial to occur.
3. Due to the ongoing Covid-19 restrictions in the State of Illinois and the City of Chicago, Mr. Steinback and Mr. Murphy are subject to quarantine protocols that have been implemented here. They have not been able to meet in person and discuss important aspects of the plea agreement, although many conversations via phone

have taken place with both Mr. Steinback and Mr. Murphy, as well as more recent calls between Mr. Steinback and Ms. Lundquist.

4. The landscape of Covid-19 is constantly changing, in the past 2 months on a serious upward trend, with warnings and restrictions placed on gatherings, and even meeting with people “outside the bubble” of the family members with whom you immediately reside. This has made it nearly impossible to meet face to face with defendant and counsel.
5. Furthering the difficulty of a face -to -face meeting is the fact that Mr. Steinback, on September 23, 2020, welcomed a new grandson into his family and home. His daughter and son-in-law moved into his home in Roscoe, IL, last March due to the pregnancy and living in Chicago, where the virus was rampant, and unfortunately, still is. The baby was born almost a month early because his daughter suffered from pre-eclampsia, a dangerous and life-threatening complication of pregnancy. With Covid-19 continuing to show a third surge, Mr. Steinback, his wife, daughter and son-in-law have had to be extremely cautious and diligent in avoiding exposure to the virus. The baby is doing well, although has a weakened immune system due to his early birth, which makes adhering to these precautionary measures of the utmost importance.
6. As noted in this Honorable Court’s last order, our prior request was to be our final request for a continuance. We respect and understand the Court’s need to proceed expeditiously with this case. Unfortunately, with the existing uncertainty of Covid-19, and the inability to predict with any certainty what will come next, we pray this Honorable Court will understand the need for this motion and see fit to grant it.
7. AUSA Kyndra Lundquist has been contacted and does not oppose this request,

WHEREFORE, the defendant, Romel Murphy, prays for an Order granting this motion to extend the Entry of a Plea and to correspondingly extend the trial date accordingly, to a time after 60 days, consistent with the calendar of this Honorable Court.

Respectfully submitted,

/s/Jeffrey B. Steinback

Jeffrey B. Steinback

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